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Rubalcava*

9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11 RIVERSIDE DIVISION
12

13 **JONATHAN WAYNE BOTTEN,**
14 **SR., et al.,**

15 Plaintiffs,

16 v.

17 **STATE OF CALIFORNIA, et al.,**

18 Defendants.
19
20

No. 5:23-cv-257 KK (SHKx)

**STATE DEFENDANTS' NOTICE
OF LODGING ELECTRONIC
EXHIBITS IN SUPPORT OF
MOTION FOR SUMMARY
JUDGMENT**

Date: March 20, 2025
Time: 9:30 a.m.
Courtroom: 3 (3rd Floor)
Judge: Hon. Kenly Kiya Kato
Trial Date: July 28, 2025
Action Filed: February 17, 2023

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22 TO THE COURT, PARTIES, AND COUNSEL OF RECORD:

23 PLEASE TAKE NOTICE that, under Local Rule 5-4.2(b)(1) and 11-5.1,
24 Defendants Blackwood, Kee, and Rubalcava (State Defendants) are lodging the
25 non-paper exhibits listed below, with the Court, via submission of a USB flash
26 drive. The exhibits are being submitted in support of the State Defendants' Motion
27 for Summary Judgment (ECF No. 86).
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1 1. Exhibit B: Mobile Video Audio Recording System (MVARs), Part 1, from
2 the patrol unit Defendant Kee drove on February 17, 2021.

3 2. Exhibit C: MVARs, Part 2, from the patrol unit Defendant Kee drove on
4 February 17, 2021.

5 3. Exhibit D: MVARs, Part 1, from the patrol unit Defendant Blackwood
6 drove on February 17, 2021.

7 4. Exhibit E: MVARs, Part 2, from the patrol unit Defendant Blackwood
8 drove on February 17, 2021.

9 5. Exhibit F: MVARs, Part 3, from the patrol unit Defendant Blackwood
10 drove on February 17, 2021.

11 6. Exhibit G: MVARs, Part 4, from the patrol unit Defendant Blackwood
12 drove on February 17, 2021.

13 7. Exhibit H: Cellphone footage that Edward Mangerino recorded on
14 February 17, 2021, bates stamped COSB001459.

15 8. Exhibit I: Cellphone footage that Erin Mangerino recorded on February 17,
16 2021, bates stamped COSB001416.

17 9. Exhibit J: Cellphone footage that Betzbeth Gonzalez recorded on February
18 17, 2021, bates stamped PLAINTIFF 0241.

19 10. Exhibit K: Cellphone footage that Plaintiff Jonathan W. Botten Sr.
20 recorded on February 17, 2021, bates stamped COSB001469.

21 11. Exhibit L: Audio recorded interview of Plaintiff Annabelle Botten,
22 conducted on February 17, 2021, bates stamped COSB001379.

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1 12. Exhibit M: Audio recorded interview of Plaintiff Jonathan W. Botten, Sr.,
2 conducted on February 17, 2021, bates stamped COSB001391.

3 Dated: January 31, 2025

Respectfully submitted,

4 ROB BONTA
5 Attorney General of California
6 NORMAN D. MORRISON
Supervising Deputy Attorney General

7 */s/ Diana Esquivel*

8 DIANA ESQUIVEL
9 Deputy Attorney General
10 *Attorneys for Defendants Blackwood,*
Kee, and Rubalcava

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